

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

INSITUFORM TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. 04-10487 GAO
	)	
AMERICAN HOME ASSURANCE	)	
COMPANY,	)	
	)	
Defendant.	)	
	)	

**AGREED MOTION TO AMEND CASE SCHEDULE**

Defendant American Home Assurance Company (“American Home”) hereby moves the Court to amend the case schedule to allow additional time for the parties to conduct fact and expert discovery. In support of this motion, American Home states as follows:

1. Document discovery in connection with this matter is ongoing and already has involved the production of many thousands of pages of documents.
2. Counsel have conferred and the parties agree that the case schedule should be amended to reflect the following new dates and deadlines:
  - a. Defendant to disclose its expert witnesses and provide Rule 26 reports by August 21, 2006;
  - b. Parties to complete discovery by September 29, 2006.
3. The case is currently set for a status conference on September 12, 2006, which the Court may wish to reschedule in light of the dates proposed herein.

WHEREFORE, American Home respectfully requests an order be entered amending the existing case schedule to reflect the new dates set forth herein.

Respectfully submitted,

AMERICAN HOME ASSURANCE COMPANY,

By its attorneys,

/s/ Kurt M. Mullen

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Dated: July 26, 2006

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

Pursuant to Local Rule 7.1(A)(2), I hereby certify that I have conferred with Plaintiff's counsel and he agrees to the relief requested in this Motion.

/s/ Kurt M. Mullen

Kurt M. Mullen

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 26, 2006.

/s/ Kurt M. Mullen